

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI  
SOUTHERN DIVISION**

WARREN S. HAGAR,

Plaintiff,

v.

DOUG RADER, *et al.*,

Defendants.

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Case No. 3:17-CV-05022-SRB

**DEFENDANT BRAD COLE’S MOTION FOR SUMMARY JUDGMENT**

COMES NOW Defendant Brad Cole, by and through his undersigned counsel, and moves for summary judgment under Federal Rule of Civil Procedure 56 in his favor and against Plaintiff as to Count III asserted in Plaintiff’s Second Amended Complaint. In support of this Motion for Summary Judgment, Defendant Cole has filed contemporaneously herewith, Suggestions in Support and they are incorporated herein by reference as though fully set forth herein.

WHEREFORE, Defendant Brad Cole moves for summary judgment in his favor and against Plaintiff on Count III of Plaintiff’s Second Amended Complaint.

Respectfully submitted,

ENSZ & JESTER, P.C.

/s/ Matthew J. Gist

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**ATTORNEYS FOR CHRISTIAN  
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**CERTIFICATE OF SERVICE**

I hereby certify that, on June 13, 2018, the above and foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all counsel of record.

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/s/ Matthew J. Gist

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